Appendix A

Specific Comments and Concerns Voiced by Village Residents in the General Area of the Red Dog Mine

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This appendix inventories the concerns, opinions, and observations from members of the native communities surrounding the Red Dog Mine. These abbreviated statements are from conversations that DEC staff have had with village residents on the phone, at meetings, and at the February 2002 Alaska Forum on the Environment. DEC would like to get input from a broad cross-section of the communities. If you have additional concerns, suggestions, or comments to share with DEC and other stakeholders, please call Sandra Smith at (907) 465-5365, e-mail to: sandy_smith@envircon.state.ak.us, or mail to her at 410 Willoughby Ave., Suite 303, Juneau, AK 99801.

The list of comments is separated into groups of comments relevant to fugitive dust and ore concentrate release and those that are not necessarily related to fugitive dust. This section is intended as a forum for local comments. DEC did not investigate or validate any of the comments presented here.

Following the local concerns is a section for initial responses. This section, as well as the comment section, is a work in progress and additional information and responses will be incorporated into this section. The final draft, containing all comments and concerns pertaining to the Red Dog Mine and its facilities, will be circulated to the public for review, input, and response.

Below is a list of comments and concerns relevant to the fugitive dust issue along the DMTS road and at the DMTS port.

- During March, winds at the port site frequently reach speeds of 70 to 90 mph. Dust around the concentrate storage building at the port is visible from a distance. There is concern that the lagoons and lakes around the port are impacted. Water and sediment samples were requested for these waters.
- Questions have been raised concerning the quality of samples taken by Teck Cominco's contractor during the fall study. Sample locations allegedly were sprinkled or washed down by Teck Cominco employees before Exponent samplers came onsite to collect samples.
- Teck Cominco's contractors allegedly were rushed and hassled, resulting in contamination of the samples.
- Teck Cominco employees were tasked with cleanup of contaminated areas and sampling locations before state and federal inspections or site visits by third parties.

• Frequently, the area around the PM₁₀ samplers were wetted down to reduce dust around the samplers, thus impacting the samples required by the air permitting/compliance.

Following are concerns not necessarily related to fugitive dust. These comments will be identified and relayed to appropriate resource agency staff and will not be addressed through this project.

- The north side of the tailings pond shows large areas of exposed sediment. Especially during the fall and in March, strong north winds (90 mph) pick up large amounts of dust and impact the Red Dog Creek at the mine site. Sampling of the water of the Middle Fork of the Red Dog Creek and sediment samples were requested. Moss and vegetation samples were requested west of the tailings ponds, as this is a favorite area for caribou while migrating through the mine area.
- Fears were expressed that leakage of the water from the tailings pond could affect the Ikalukrok Creek. Water and sediment sampling were requested for the Ikalukrok outside the mine boundaries and at the confluence of the Ikalukrok and the Wulik.
- Information about the toxicity of the tailings pond was requested.
- A spill site south of Tutak Creek should be studied more comprehensively.
 The spill occurred just prior to or during a storm, which delayed cleanup for
 several days. The ore concentrate was spread on the snow and could have
 drained into the ground with the melting snow.
- Animals have been observed licking the calcium chloride after it is sprayed on the road. Questions were raised on the effects of these chemicals on the animals and the surrounding vegetation.
- Grayling samples were requested from the upper Ikalukrok.
- Village residents from Kivalina say the caribou migration has been diverted because of the port facility. Villagers now need to use snow machines to intercept the herd.
- There were alleged fish kills last summer due to high total dissolved solids (TDS).
- Villagers would like a "hotline" to call and report Red Dog environmental complaints. Would e-mail work?
- Ptarmigan are a prime subsistence food and are "stationary" in the area. Tissue samples were requested.
- Moose and caribou were observed drinking from the tailings ponds and staggering off weakened.

• A moose was observed swimming halfway though the pond and turning around. Upon reaching the shore the moose staggered and "froze" on the banks, weakened and potentially affected by the chemicals in the pond.

Below are the initial responses from Teck Cominco and their contractor to clarify some of the concerns and comments related to fugitive dust that were mentioned at the beginning of Appendix A.

The concern or comment addressed is repeated for clarity. In one case, DEC took the liberty to address the initial response to clarify state regulation.

- Questions have been raised concerning the quality of samples taken by Teck Cominco's contractor during the fall study. Sample locations allegedly were sprinkled or washed down by Teck Cominco employees before Exponent samplers came onsite to collect samples.
 - Initial Response: The planned sampling station locations were approximate prior to actually going into the field. For vegetation samples, once a sampler got to the approximate area planned for sampling, the appropriate species had to be identified in the general vicinity before the sample could be collected. Therefore, it is highly unlikely anyone could have pre-sprinkled these areas. For soil samples on the road, exact locations were identified in the field, and these may have been close to the planned stations. It should be noted that Teck Cominco regularly wets the road to minimize the generation of dust. Soil samples were collected at varying depths into the road surface, and would have been unaffected by any sprinkling or wetting.
- Teck Cominco's contractors allegedly were rushed and hassled, resulting in contamination of the samples.
 - Initial Response: Adequate time was available for all sampling. As with most environmental sampling, the work proceeded in an efficient and timely manner to complete the task. Careful precautions were taken to avoid cross-contamination of samples. No one hassled the samplers.
- Teck Cominco employees were tasked with cleanup of contaminated areas and sampling locations before state and federal inspections or site visits by third parties.
 - Initial Response: State law requires the responsible party to notify the state of a spill and begin cleanup immediately. It is appropriate that cleanup should begin without the presence of state, federal, or other third parties. Other than accidental spills, there was no intent or activities that would have reduced site concentrations prior to sampling or inspection.

- **DEC Response:** 18AAC 75.310 regulates actions to be taken as a first response. After reporting a spill or contamination, the responsible party is required to submit a work plan for site characterization to DEC. After this work plan is approved, cleanup measures can begin.
- Frequently, the area around the PM₁₀ samplers were wetted down to reduce dust around the samplers, thus impacting the samples required by the air permitting/compliance.
 - **Initial Response:** Teck Cominco applies water frequently to all of its operational areas, including areas where the PM_{10} samplers are located, to minimize dust generation.